

# **EXHIBIT D**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO**

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MELODY JOY CANTU AND DR.  
RODRIGO CANTU,

Plaintiffs,

v.

**5:20-CV-0746 JKP – HJB**

**Plaintiff Dr. Cantu’s  
Responses to Defendant Dr.  
Guerra’s First Set Of  
Interrogatories**

DR. SANDRA GUERRA and  
DIGITAL FORENSICS CORPORATION,  
LLC,

Defendants.

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**Plaintiff Dr. Rodrigo Cantu’s Response to Defendant Dr. Guerra’s First Set of  
Interrogatories**

Plaintiff Dr. Rodrigo Cantu hereby responds to the interrogatories served by Defendant Dr. Sandra Guerra. Defendant reserves the right to change, revise, and supplement these responses and objections based on new information.

**GENERAL OBJECTIONS**

1. Plaintiff objects to the Interrogatories to the extent that they seek information and/or documents that are protected from disclosure by the attorney-client privilege, the joint defense privilege, the work product doctrine, or any other privilege or legal protection from disclosure.
2. Plaintiff objects to the Interrogatories to the extent that they seek information and/or documents that are confidential, competitively sensitive, and/or trade secrets.

3. In responding to and/or objecting to the Interrogatories, Plaintiff does not concede that any of the documents and/or information sought are relevant to, material to, or admissible in this action, or reasonably likely to lead to the discovery of evidence that would be relevant to, material to, or admissible in any proceeding, including, but not limited to, this action. No objection or limitation in this response, or lack thereof, shall be deemed an admission by Plaintiff as to the responsiveness, relevance, existence, or nonexistence of documents or information.
4. In responding to the Interrogatories, Plaintiff does not in any way waive or intend to waive, but rather intends to preserve and is preserving, all objections as to competency, relevancy, materiality, and admissibility of the Interrogatories or the subject matter thereof, all objections as to vagueness, ambiguity, and undue burden, all rights to object on any ground to the use of any of said documents or responses, or the subject matter thereof, in any subsequent proceeding, in this action or any other proceeding, and all rights to object on any ground to any request for further responses to these or any other requests for documents, interrogatory requests, or any other discovery requests involving or related to the subject matter of the Interrogatories.
5. Plaintiff objects to the Interrogatories to the extent that they call for the production of documents and/or information already in the possession or control of Defendant or documents produced or made available for inspection by other sources, on the grounds that such production would be unnecessary and unduly burdensome. Plaintiff objects to the Interrogatories to the extent that they purport to require Plaintiff to seek out and produce documents that are not within its actual possession or control or that could just as easily be obtained by Defendant as Plaintiff.

6. Plaintiff objects to the Definitions and Instructions of the Interrogatories to the extent that they seek to impose obligations different from or in excess of the obligations imposed by Federal Rules of Civil Procedure.

## RESPONSES

- 1. Identify with specificity all the compensatory damages (including, without limitation, all medical bills and costs) you seek to recover from Dr. Guerra in connection with the CFAA Claims you have asserted against Dr. Guerra. Please include with your answer the amount of each item of compensatory damages and the date such damage/cost was incurred.**

Plaintiff objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, seeks irrelevant information, and seeks information already known to Defendant and is premature as damages are not an issue at this juncture.

- 2. Identify with specificity all the compensatory damages (including, without limitation, all medical bills and costs) you seek to recover from Digital Forensics Corporation, LLC (“DFC”) in connection with the CFAA Claims you have asserted against DFC. Please include with your answer the amount of each item of compensatory damages and the date such damage/cost was incurred.**

Plaintiff objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, seeks irrelevant information, and seeks information already known to Defendant and is premature as damages are not an issue at this juncture.

- 3. Identify with specificity all the compensatory damages (including, without limitation, all medical bills and costs) you seek to recover from Dr. Guerra in connection with the Texas Statutory Claims you have asserted against Dr. Guerra. Please include with your answer the amount of each item of compensatory damages and the date such damage/cost was incurred.**

Plaintiff objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, seeks irrelevant information, and seeks information already known to Defendant and is premature as damages are not an issue at this juncture.

- 4. Identify with specificity all the compensatory damages (including, without limitation, all medical bills and costs) you seek to recover from DFC in connection with the Texas Statutory Claims you have asserted against DFC. Please include with your answer the amount of each item of compensatory damages and the date such damage/cost was incurred.**

Plaintiff objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, seeks irrelevant information, and seeks information already known to Defendant and is premature as damages are not an issue at this juncture.

- 5. Identify with specificity all the compensatory damages (including, without limitation, all medical bills and costs) you seek to recover from Dr. Guerra in connection with the malicious prosecution claim you have asserted against Dr. Guerra. Please include with your answer the amount of each item of compensatory damages and the date such damage/cost was incurred.**

Plaintiff objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, seeks irrelevant information, and seeks information already known to Defendant and is premature as damages are not an issue at this juncture.

- 6. Identify with specificity all the compensatory damages (including, without limitation, all medical bills and costs) you seek to recover from DFC in connection with the malicious prosecution claim you have asserted against DFC. Please include with your answer the amount of each item of compensatory damages and the date such damage/cost was incurred.**

Plaintiff objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, seeks irrelevant information, and seeks information already known to Defendant and is premature as damages are not an issue at this juncture.

- 7. Identify with specificity all the compensatory damages (including, without limitation, all medical bills and costs) you seek to recover from Dr. Guerra in connection with the intentional infliction of emotional distress claim you have asserted against Dr. Guerra. Please include with your answer the amount of each item of compensatory damages and the date such damage/cost was incurred.**

Plaintiff objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, seeks irrelevant information, and seeks information already known to Defendant and is premature as damages are not an issue at this juncture.

- 8. Identify with specificity all the compensatory damages (including, without limitation, all medical bills and costs) you seek to recover from DFC in connection with the intentional infliction of emotional distress claim you have asserted against DFC. Please include with your answer the amount of each item of compensatory damages and the date such damage/cost was incurred.**

Plaintiff objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, seeks irrelevant information, and seeks information already known to Defendant and is premature as damages are not an issue at this juncture.

**9. Identify with specificity all the consequential damages (including, without limitation, all medical bills and costs) you seek to recover from Dr. Guerra in connection with the CFAA Claims you have asserted against Dr. Guerra. Please include with your answer the amount of each item of consequential damages and the date such damage/cost was incurred.**

Plaintiff objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, seeks irrelevant information, and seeks information already known to Defendant and is premature as damages are not an issue at this juncture.

**10. Identify with specificity all the consequential damages (including, without limitation, all medical bills and costs) you seek to recover from Digital Forensics Corporation, LLC (“DFC”) in connection with the CFAA Claims you have asserted against DFC. Please include with your answer the amount of each item of consequential damages and the date such damage/cost was incurred.**

Plaintiff objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, seeks irrelevant information, and seeks information already known to Defendant and is premature as damages are not an issue at this juncture.

**11. Identify with specificity all the consequential damages (including, without limitation, all medical bills and costs) you seek to recover from Dr. Guerra in connection with the Texas Statutory Claims you have asserted against Dr. Guerra. Please include with your answer the amount of each item of consequential damages and the date such damage/cost was incurred.**

Plaintiff objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, seeks irrelevant information, and seeks information already known to Defendant and is premature as damages are not an issue at this juncture.

**12. Identify with specificity all the consequential damages (including, without limitation, all medical bills and costs) you seek to recover from DFC in connection with the Texas Statutory Claims you have asserted against DFC. Please include with your answer the amount of each item of consequential damages and the date such damage/cost was incurred.**

Plaintiff objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, seeks irrelevant information, and seeks information already known to Defendant and is premature as damages are not an issue at this juncture.

**13. Identify with specificity all the consequential damages (including, without limitation, all medical bills and costs) you seek to recover from Dr. Guerra in connection with the malicious prosecution claim you have asserted against Dr.**

**Guerra. Please include with your answer the amount of each item of consequential damages and the date such damage/cost was incurred.**

Plaintiff objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, seeks irrelevant information, and seeks information already known to Defendant and is premature as damages are not an issue at this juncture.

**14. Identify with specificity all the consequential damages (including, without limitation, all medical bills and costs) you seek to recover from DFC in connection with the malicious prosecution claim you have asserted against DFC. Please include with your answer the amount of each item of consequential damages and the date such damage/cost was incurred.**

Plaintiff objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, seeks irrelevant information, and seeks information already known to Defendant and is premature as damages are not an issue at this juncture.

**15. Identify with specificity all the consequential damages (including, without limitation, all medical bills and costs) you seek to recover from Dr. Guerra in connection with the intentional infliction of emotional distress claim you have asserted against Dr. Guerra. Please include with your answer the amount of each item of consequential damages and the date such damage/cost was incurred.**

Plaintiff objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, seeks irrelevant information, and seeks information already known to Defendant and is premature as damages are not an issue at this juncture.

**16. Identify with specificity all the consequential damages (including, without limitation, all medical bills and costs) you seek to recover from DFC in connection with the intentional infliction of emotional distress claim you have asserted against DFC. Please include with your answer the amount of each item of consequential damages and the date such damage/cost was incurred.**

Plaintiff objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, seeks irrelevant information, and seeks information already known to Defendant and is premature as damages are not an issue at this juncture.

**17. Identify with specificity the amount of punitive damages you seek to recover from Dr. Guerra in connection with your claims asserted against her in the lawsuit and the basis for the calculation of such amount.**

Plaintiff objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, seeks irrelevant information, and seeks information already known to Defendant and is premature as damages are not an issue at this juncture. Without waiving

the foregoing objections, and reserving the right to change this number based upon new information and trial, Plaintiff seeks \$10,000,000.00 in punitive damages.

**18. Identify with specificity the amount of punitive damages you seek to recover from DFC in connection with your claims asserted against them in the lawsuit and the basis for the calculation of such amount.**

Plaintiff objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, seeks irrelevant information, and seeks information already known to Defendant and is premature as damages are not an issue at this juncture. Without waiving the foregoing objections, and reserving the right to change this number based upon new information and trial, Plaintiff seeks \$10,000,000.00 in punitive damages.

Certificate of Service

I certify that on September 15<sup>th</sup>, 2022, I served the above responses to Defendant's attorneys according to the Federal Rules of Civil Procedure.

*/s/ Michael Hassard*  
Michael Hassard